

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

In re:) Case No. 24-11369
RYAN ANTHONY PRESTON TODD and,) Chapter 13
JESSICA TODD) Judge Beth A. Buchanan
Debtors.)

**DECLARATION OF MATTHEW R. CHASAR
ATTORNEY FOR CREDITOR STEVE ROBERTSON TRUCKING, LLC**

1. I have personal knowledge of and am competent to testify with regarding all matters set forth herein.
2. I am an attorney for Creditor Steve Robertson Trucking, LLC (“Creditor”).
3. Attached hereto as Exhibit 1 is a true and correct copy of the judgment rendered in favor of Creditor and against Debtor Ryan Anthony Preston Todd (“Mr. Todd”) on November 21, 2022 (the “Judgment”) in a matter styled *Steve Robertson Trucking, LLC v. Ryan Todd*, Butler Cnty. C.P. No. CV 2021 02 0161 (the “Initial Lawsuit”).
4. Mr. Todd has never paid any amount on the Judgment.
5. Attached hereto as Exhibit 2 is a true and correct copy of the Order Holding Mr. Todd and J R&J Trucking, LLP in Contempt of Court in the Initial Lawsuit (the “Contempt”).
6. Neither Mr. Todd nor J R&J Trucking, LLP have paid any of the amount awarded through the Contempt.

7. Attached hereto as Exhibit 3 is a true and correct copy of the Complaint Creditor filed against Debtors Ryan Todd and Jessica Todd (collectively “Debtor”) in a matter styled *Steve Robertson Trucking, LLC v. Ryan Todd, et al*, Butler Cnty. C.P. No. CV. 2023 04 0848 (the “Second Lawsuit”).

8. Attached hereto as Exhibit 4 is a true and correct copy of a Motion to Compel and for Sanctions (“Sanctions Motion”) that Creditor filed against Debtor in the Second Lawsuit. Debtor did not file any opposition to the Sanctions Motion.

9. On June 5, 2024 the Butler County Court of Common Pleas held a hearing on the Sanctions Motion. Counsel for Debtor appeared. Attached hereto as Exhibit 5 is a true and correct copy of the transcript from this hearing.

10. On June 12, 2024 I sent a proposed order granting the Sanctions Motion and awarding default judgment to Creditor and against Debtor to Debtor and Debtor’s counsel. Debtor and Debtor’s counsel did not respond to this proposed order.

11. Attached hereto as Exhibit 6 is a true and correct copy of the Complaint filed in the Initial Action.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 6, 2024.



Matthew R. Chasar

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2024 a true and accurate copy of the foregoing was served electronically through the court's ECF System and all ECF participants registered in this case at the email address registered with the court, and by first class mail on August 6, 2024 addressed to:

Ryan Anthony Preston Todd
Jessica Todd
Debtors
8120 S.R. 28
Leesburg, OH 45135

/s/ Matthew R. Chasar

Matthew R. Chasar